

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
Southern DIVISION

QUESTIONNAIRE FOR THE PRISONERS PROCEEDING
PRO SE UNDER 42 U.S.C. § 1983

ADRIAN LAMAR BRINSON

GOC # 1171205

(GIVE FULL NAME AND PRISON NUMBER OF PLAINTIFF)

Plaintiff

VS. See Attachment

SGT Gillison

SGT Beard

Officer Strekland AKA Taylor

Deputy Warden Kruglar

(NAME OF EACH DEFENDANT)

Defendant(s)

Amended

CIVIL ACTION NO:

CV 423-039

I. GENERAL INFORMATION

1. Your full name and prison number Adrian Lamar Brinson GOC #1171205
2. Name and location of prison where you are now confined Central State Prison, Macon Ga.
3. Sentence you are now serving (how long?) 10 yrs credit from 11/17/17
 - (a) What were you convicted of? Aggravated Assault Robbery
poss of firearm poss by convicted felon
 - (b) Name and location of court which imposed sentence Thomas County Superior
Court Thomasville Ga.
 - (c) When was sentence imposed? April 2018
 - (d) Did you appeal your sentence and/or conviction? Yes ☒ No ☐
 - (e) What was the result of your appeal? Denied

Defendant List

1. officer stockland Coastal State Prison
2. Lt. Brittany B. Beard Coastal State Prison
3. SGT Gillison Coastal State Prison
4. unit manger Tia Fletcher Coastal State Prison
5. Deputy warden C & T Kugler Coastal State Prison
6. Counselor Smith Central State Prison
7. Central State Prison business office
8. terrance myricks central State Prison
9. Derrick Davis GDC# central state Prison
10. Kyle walker GDC# ware state Prison
11. Lt Caldwell Central State Prison

(f) Approximate date your sentence will be completed 11/17/27

II. PREVIOUS LAWSUITS

NOTE: FAILURE TO DISCLOSE ALL PRIOR CIVIL CASES MAY RESULT IN THE DISMISSAL OF THIS CASE. IF YOU ARE UNSURE OF ANY PRIOR CASES YOU HAVE FILED, THAT FACT MUST BE DISCLOSED AS WELL.

4. Other than an appeal of your conviction or sentence, and other than any habeas action, have you filed a lawsuit dealing with the same or similar facts or issues that are involved in this action?

Yes ☐ No ☒

5. If your answer to question 4 is "Yes," list that lawsuit below, giving the following information:

(IF YOU HAVE FILED MORE THAN ONE LAWSUIT, LIST OTHER LAWSUITS ON A SEPARATE SHEET OF PAPER, GIVING THE SAME INFORMATION FOR EACH)

(a) Parties to the previous lawsuit INVOLVING SAME FACTS:

Plaintiff(s): _____

Defendant(s): _____

(b) Name of Court: _____

(c) Docket Number: _____ When did you file this lawsuit? _____

(d) Name of judge assigned to case: _____

(e) Is this case still pending? Yes ☐ No ☐

(f) If your answer to (e) is "No", when was it disposed of and what were the results?

(DID YOU WIN? WAS THE CASE DISMISSED? DID YOU APPEAL?)

6. Other than an appeal of your conviction or sentence, and other than any habeas action, have you ever filed any lawsuit while incarcerated or detained? Yes ☐ No ☒

7. If your answer to question 6 is "Yes," list that lawsuit below, giving the following information:

(IF YOU HAVE FILED MORE THAN ONE LAWSUIT, LIST OTHER LAWSUITS ON A SEPARATE SHEET OF PAPER, GIVING THE SAME INFORMATION FOR EACH)

(a) Parties to the previous lawsuit:

Plaintiff(s): _____

Defendant(s): _____

(b) Name of Court: _____

(c) Docket Number: _____ When did you file this lawsuit? _____

(d) Name of judge assigned to case: _____

(e) Is this case still pending? Yes ☐ No ☐

(f) If your answer to (e) is "No", when was it disposed of and what were the results?
(DID YOU WIN? WAS THE CASE DISMISSED? DID YOU APPEAL?)

8. AS TO ANY LAWSUIT FILED IN ANY FEDERAL COURT in which you were permitted to proceed *in forma pauperis*, was any suit dismissed on the ground that it was frivolous, malicious, or failed to state a claim? Yes ☐ No ☒

If your answer is Yes, state the name of the court and docket number as to each case:

III. PLACE OF INCIDENT COMPLAINED ABOUT

9. Where did the matters you complain about in this lawsuit take place? Coastal State
prison Garden City Georgia / Central State Prison

(a) Does this institution have a grievance procedure? Yes ☒ No ☐

(b) If your answer to question 9(a) is "Yes", answer the following:

(1) Did you present your complaint(s) herein to the institution as a grievance?

Yes ☒ No ☐

(2) If Yes, what was the result? Grievance rejected due
to a extra page attached. Appealed
and grievance still reject too many
pages.

(3) If No, explain why not: _____

(c) What, if anything else, did you do or attempt to do to bring your complaint(s) to the attention of prison officials? Give dates and places and the names of persons talked to.

Spoke with mental health counselor concerning the threat Ms. Mantee
 took me to unit manager tia fletcher who is friends of Beard nothing done about
 threat. I wrote everything down that was going on and read it
 to my creative writing class Mrs. Ivey was the teacher that day

(d) Did you appeal any denial of your grievance to the highest level possible in the prison system? Yes ☒ No ☐

(1) If Yes, to whom did you appeal and what was the result? I appealed
my grievance up to professional standards with
the Dept of corrections

(2) If No, explain why you did not appeal: _____

10. In what other institutions have been confined? Give dates of entry and exit.

Central state prison Ware state Prison
 Coastal state Prison • Rodgers state Prison
 Dooley state Prison
 Jackson state Prison
 Wheeler Corr.

IV. PARTIES TO THIS LAWSUIT

11. List your CURRENT place of incarceration/mailling address.

Central : state prison
 4600 Fulton mill Rd.
 Macon Georgia

12. List the full name, the official position, and the place of employment of each defendant in this lawsuit. (ATTACH ADDITIONAL PAGES IF NECESSARY)

Defendant SGT Br. Hany Beard Lt Coastal state Prison
 Defendant SGT G. I. Ison Coastal state Prison
 Defendant Deputy warden care treatment Coastal state Prison Ms. Kagler
 Defendant officer strickland / Taylor Coastal state Prison
 Defendant Tia Fletcher Mental health unit manager @ Coastal state Prison
 Defendant counselor Smith @ Central state Prison
 Defendant Central state business officer.

Claim 1: on Oct 25 2023
 2nd block @ Coastal state Prison I spoke
 with mental health counselor mactee at
 my appointment and shared with her
 concerns that my life was in trouble.
 I explained to her that a officer
 at the prison had put a hit out
 on me because on July 5th 2019
 a Barnbridge teen by the name of
 Tanzania Rashawn Cooper was shot and
 killed in Thomasville Ga. on Fernberg st. My
 Co defendant Derylmairz Jackson was charged
 for the murder along with my ex girlfriend
 Alvincisa Davis. 2 days after the incident
 Demick Davis shot my stepson in retaliation
 to Tanzania murder. Let the record show
 that Tanzania Cooper is from barnbridge
 Ga. He is related to Lt Brittany Beard
 at Coastal state Prison whom is also
 from barnbridge Ga. I told ms mactee

that Derrick Davis AKA BB was at Coastal State Prison. Derrick Davis and Lt Beard are classmates from Class of 2012. Beard and Davis had made threats to plaintiff Brinson "to make sure he gets touched"

Counselor mactee reported the threat to Unit manager tia Fletcher. Unit manager Fletcher and Lt Beard are good friends and instead of relaying message to Security ms Fletcher informed Lt Beard that I was going to write a statement on her. Unit manager ms Fletcher put inmates life in further danger by Giving Lt Beard heads up.

Witness:

Alvinesia Davis

Derylmaize Jackson

GOI special agent John Doe
mactee

Claim 2: On Oct 28 2022

Coastal State Prison 1:38pm medication P.II call window. SGT /Lt Beard stopped and asked could she speak with me a min. I didn't feel comfortable so I asked another inmate John Doe #2 to come with me. Derrick Davis was beside her. Beard stated that "if Beard wants to get something done to you then Beard gets it done." I walked off but was approached by Davis and Davis stated that "if I get Beard in trouble I'll get seen about." I told SGT Richardson about threats by Davis and Beard and Richardson refused to let me go to Protective Custody. On Nov 8th 2022 @ 2:08pm @ coastal state prison W building yard. I was on the yard and inmate Toliver approached me and said that SGT Beard was in the building

looking for me, and that she said she was not leaving until she spoke with me. I stayed outside but she came outside with officer Strickland. As soon as SGT Beard seen me she walked up to me and started yelling at me. Officer Strickland stood by the door smiling as Beard assaulted me verbal and made more threats that were carried out on Nov 16th 2022. On Nov 15th 2022 and block Coastal State Prison Gym Creative writing class with ms ivey. During class I exposed SGT Beard to be corrupt and having evil intents. I told the class in a essay about my issues with Beard and threats to my life. I also told about the illegal activity SGT Beard has been getting into.

Witness
 ms ivey
 Creative writing class
 John Doe #2
 SGT Richardson

Toliver

Claim 3: on nov 16th 2022 @
 Coastal state prison 7:12am inmate
 Trey witnessed officer Strickland speaking
 with inmate See Brown and Strickland
 stated that there was a hit on a muslim.
 Inmate Trey had knowledge of the
 threat made by Bearel and thought that
 Strickland was speaking of me so he told
 me to be careful. nov 16th 2022 @ Coastal
 State Prison 2:38pm in building. officer Strickland
 called me outside the building and told
 me to pack up my things. Once I returned
 with my property officer Strickland was
 outside talking to Derrick Davis and Kyle
 Walker. Inmate Hogan and Jacob approached
 me and told me "they heard what's going
 on and to don't say nothing when I
 get to the building." I turned around and
 Davis and Walker had came up behind
 me. They attacked me. During the
 attack officer Strickland was less than

feet away while the incident took place.
 officer stockland didn't aid assist,
 didn't call in 1010 code didn't respond
 didn't stop the inmates. Didn't report the
 incident and made threats that "SGT Barcl
 was at medical Don't go that way."
 As I passed Stockland to get away
 from attackers another group of inmates
 attacked my by N building gate. I
 ran up the flat top and went to
 Security. I was never treated
 at medical I was refused medical
 treatment by Deputy warden of C&T
 she asked me where I couldn't go
 and I told her the clerks that jumped
 on me from F building and that's where
 she put me. SGT Gillison and Deputy warden
 of care & treatment denied me medical
 attention after the incident and denied
 me protective custody after I wrote a
 statement of the inmates and officers

witnesses
 Moore
 Mr. Parker
 Hagen
 They

Jacobs
 Joe Brown

Claim 4: On Nov 16th 2023 ^{2:44pm} Coastal

State Prison. Deputy warden of care and treatments office. Once I got into the office, office of ms Krugar! SGT Gillison and SGT Gibbs were in the room. As I stated to the warden what was going on SGT Gillison stopped me and defended SGT Beard saying she has nothing to do with this. I told the DW that I wanted to go to protective custody and they said I would have to write a statement with names so I did. Once I wrote the statement in which included Strickland and Beards illegal activities SGT Gillison quickly pulled up the footage and made a copy. My nose was still bleeding and they made me sit in the lobby while they talked. No medical attention given. Inmate Brinson didn't receive no more medical treatment while being at Coastal due to retaliation from staff that were friends with SGT Beard. DW Krugar asked what building I could go to because there was no room in the hole denying me protective custody. I told her any where but F building because SGT Beard ran that building and the boys connected to the assault were in that building. SGT Gillison stated put him in F. Putting me in further danger.

Dwarden called Officer Strickland to the office and showed her the Statement. Officer Strickland walked out the room, looked at me and returned to her post and told the inmates I snitched on her. Due to Officer Strickland no longer being employed at Coastal State Prison cause inmates to make threats towards Brinson.

witness

Mail room officer

SGT Gibbs

Counselor Moore

MS Parker

Claim 5: On NOV 22, 2023
 @ Coastal State Prison 3pm. SGT
 Durant was told by DW of care & treatment
 to bring me to his office. Once I got to
 the office SGT Gillson and Gibbs was
 in there. SGT Gillson stated "I told you
 to leave SGT Beard out of it. Today going
 to be your last day breathing at Coastal
 State Prison." SGT Gillson retaliated against
 me and placed me in the hole for
 no reason and without DR. I was placed
 in the hole without my property no mat
 blanket or anything. On NOV 23, 2023
 Lt Brown brought my property and mat.
 Officer Big C was instructed by SGT
 Gillson to move me to a room upstairs
 but I told him that all the dudes that
 attacked me are upstairs. Big C stated
 that SGT Gillson said "if I don't move
 rooms she would come and spray me." SGT
 Gillson put me in the room with Isaac
 Grimes. A inmate that is known for stabbing

inmates. Isaac games stated before he attacked Plaintiff on Nov 23 2023 that SGT G. bbs got him to jump on me. Games stated that he was paid on apple pay. During the attack officers didn't respond to Plaintiff's screams and didn't provide medical attention.

witness

Big C (officer) Coastal State Prison
 Isaac games inmate Central State Prison
 SGT Durant (officer) Coastal State Prison
 Lt Brown (officer) Coastal State Prison
 SGT G. bbs (officer) Coastal State Prison
 Willie Book orderly (inmate)
 Charlie Baldwin (inmate)

Claim 6: On Nov 16th 2023

at Coastal State Prison I raised all the inmates that were involved in state ment and grievance. Shortly after getting to Central State Prison inmate Grimes was transferred to Central from Johnson State Prison between leaving Coastal and going to central was only 90 days and three prisons. Shortly after issue arrived Derrick Davis (BB) arrived and has kept up mess trying to get ppl to jump on plaintiff. Defendant terrance myricks and Derrick Davis attacked Plaintiff on May 9th 2023 at central State Prison. Plaintiff reported to officer Jones the threat and she passed word to Lt Caldwell but both officers refused protection. Cautely and networked with inmates to push Plaintiff back inside the dorm. Inmates terrance myricks and Derrick Davis sent text messages around the prison stating that Plaintiff was a snitch and a piece was on his head. Plaintiff moved around to 5 different cells for his safety along with inmate myron Jones.

Officer Jones and Lt Caldwell refused
medical attention refused protective
custody and put plaintiff life in
danger

witness.

Officer Jones

Lt Green

Undanger MS. McCall

Myron Jones

Claim 7: On Feb 24 2023 Plaintiff received papers from Courts ordering that he get Consent form sent back along with a copy of financial. I turned in forms to business office to be returned signed but business office at Central never returned forms. mailroom officer stated she never received anything from business office. unit manager ms Jordan stated that business office stated they will return papers on march 8th 2023 via phone. They still never returned papers. Spoke to Counselor Higgins Counselor DW Care & treatment, warden Sampson, about papers and still to this day have yet to get them from business office and holding me back from moving forward with lawsuit.

Witness.

Counselor Higgins

Counselor Telman

Doe Stevenson

DW Care & treatment

G. Sampson

ms Jordan
mailroom officer

Claim 8: On May 4th 2023 Plaintiff approached Counselor Smith in a bad state and explained to her what was going on. I told her inmates had placed a hit on my head I told her what happened at last camp and tried to give her a emergency grievance to turn in but she refused to take my grievance because she said she aint my Counselor and it aint her problem. Counselor Smith refused to sign my grievance and refused me protective Custody. I filed emergency grievance on lock and grievance has yet to be answered 1 month late.

Witness

Counselor Fields
Counselor Hodgins
Officer Jones
Myron Jones

Counselor Tolman
Doctor Stevenson
Mrs Watkins

Claim 90: In retaliation to filing the grievance on Nov 23 2022 and Statment on SGT Beard and officer Strickland I was transferred on Dec 4th 2022 to Central State. my family ordered a food package and I never received my package. Grievance was filed and still never received package. As soon as I got to central state I was put on lockdown for 2 weeks and this kept me from doing any law work and filing any paperwork on my behalf. This delay held me back on doing law work and I was not allowed to see Counselor medical or send any mail during this 2 week period. Upon coming to central officers at central spoke about the incident at Coastal with other inmates

Witness
 Charlie Baldwin (inmate) Central
 Willie Pople (inmate)
 MS Jordan Central
 Counselor Hudgins, Central

14. List the name and address of every person you believe was a WITNESS to the incident(s) you complain about, BRIEFLY stating what you believe each person knows from having seen or heard what happened. (USE ADDITIONAL SHEETS, IF NECESSARY)

(See witness attachment.)

15. BRIEFLY state exactly what you want the court to do for you. That is, what kind of relief are you seeking in this lawsuit? Do not make any legal arguments and do not cite any cases or statutes! (USE ADDITIONAL SHEETS, IF NECESSARY)

I ask that the courts grant relief in the amount of \$1 million dollars from each defendant named in this claim along with each defendant to resign their positions @ the Dept of Corrections Dept of Corrections needs better safety policies for inmates.

16. You may attach additional pages if you wish to make any legal argument. However, legal arguments are NOT required in order for you to obtain relief under §1983. If the court desires legal argument from you, it will request it. If any defendant presents a legal argument, you will be afforded an opportunity to respond thereto.

17. KEEP IN MIND THAT ONCE YOUR LAWSUIT IS FILED, THE COURT WILL REQUIRE YOU TO DILIGENTLY PROSECUTE IT. That means that you will be required to go forward with your case without delay. Thus, if you fail to adequately prepare your case before you file it, you may find your lawsuit dismissed for failure to prosecute if you take no action once it is filed. YOU WILL RECEIVE NO FURTHER INSTRUCTIONS FROM THE COURT TELLING YOU WHAT TO DO OR HOW TO DO IT! IT IS YOUR RESPONSIBILITY AND YOURS ALONE TO PROSECUTE YOUR OWN CASE! If you fail to prosecute your case, it will be dismissed under Rule 41 of the Federal Rules of Civil Procedure.

Signed this 1st day of June, 20 23.


PLAINTIFF

STATE OF GEORGIA

BIBB COUNTY

SWORN AFFIDAVITAffiant's Name: Adrian L. BensonAddress: Central State Prison 4600 Fulton Mill RoadCity: Macon State: Georgia Zip: 31208

Re: _____

Pursuant to 28 USCA Section 1746 the above named Affiant hereby certifies, deposes and states under penalty of perjury that the foregoing facts, set forth herein, are both true and correct, to the best of his knowledge. Affiant further affirms that he "sui-juris" and competent to testify in this matter. Affiant submits this Affidavit based on his personal knowledge of its contents and offers this sworn testimony for use in this court, and any lawful proceeding:

I wish to drop claims against the following defendants Timothy ward officer Big C SGT Derant Aaron Pinerio GDC Commissioner. I am at central State Prison and 3 of the inmates that were involved in the incident that were my attackers have been transferred here to central. Plaintiff life is in danger due to the fact that inmates Derrick Davis terrance myricks and issas grimes have tried to recruit inmates to jump on Plaintiff. Plaintiff has asked the courts to TPO and transferred these three inmates for the safety of the plaintiff.

This affidavit is given under penalty of perjury

Title 28 USCA Section 1746

So sworn, this 1st day of July June 20 23

/s/

GDC Number: 1171205

STATE OF GEORGIA

CERTIFICATE OF SERVICE

Comes now Adrian Bowen, by his signature below and certifies that he has this 18th day of May, 2023 served a true and exact copy of the foregoing: Motions upon the parties listed below by placing a true and exact copy of the same document in the United States Mail with sufficient postage thereon to assure its prompt delivery and that same is correctly addressed as follows:

U.S. District Court Middle Ga.
P.O. Box 1130
Augusta Ga 30903



Adrian Bowen

AB
AFFIANT PRO, SE.
GDC# 1171205
CENTRAL STATE PRISON
4600 FULTON MILL RD.
MACON, GEORGIA 31208

Pro Se 14 (Rev. 12/16) Complaint for Violation of Civil Rights (Prisoner)

UNITED STATES DISTRICT COURT

for the

Southern District of Georgia



Savannah Division

Case No.

CV423-039

(to be filled in by the Clerk's Office)

ADRIAN LAMAR BRIMSON

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

See attached #1

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

(Prisoner Complaint)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

IN THE SUPERIOR COURT OF Seithen COUNTY
STATE OF GEORGIA

Adrian Benson
Plaintiff/Petitioner
601171205

Vs.

CRIMINAL/CIVIL ACTION
FILE NO:

4:23-CV-39

Lt Brittany Beard

SGT Gillison

Officer Strickland
Defendants/Respondants

COMES NOW the above-named _____ and respectfully

presents to the Honorable Court as follows:--

Combination of motions to be
filed as followed:

Temporary restraining order

Motion for leave to file amended

complaint

Amended complaint 42 U.S.C § 1983

Summons

Motion for Appointment of counsel

first request for production of documents

Complaint for Violation of Civil rights

financials freedom of information

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF GEORGIA

ADRIAN BRINSON

1171205

Plaintiff

VS.

SGT. Gillison

TRO

Civil Action no.

4:23-CV-39

Upon the Complaint, the supporting affidavits of Plaintiff and the memorandum of law submitted herewith, it is:

Ordered that defendants Derrick Davis, Kyle Walker, Officer Strickland, SGT Gillison, SGT Beard, Deputy Warden of Case & Treatment (Coastal State Prison) Krugler, show cause in room _____ of the United States Courthouse, _____ address on the _____ day of _____ 20____, at _____ o'clock, why a preliminary injunction should not issue pursuant to Rule 65(a) of the Federal Rules of Civil Procedure enjoining the defendants their successors in office, agents and employees and all other persons acting in concert and participation with them, from having any contact with Plaintiff Adrian Brinson. Defendants Derrick Davis and Terrance

It Is Further ordered that effective immediately and pending the hearing and determination of this order to show cause, the defendants Derrick Davis & Terrance Myricks and each of there officers, agents employers, and all persons acting in concert or participation with them, are restrained from having contact with Plaintiff Adrian L. Brinson. Defendants Derrick Davis & Terrance Myricks are both at same Prison as plaintiff and ask that Derrick Davis and Terrance Myricks be transferred to keep distance from Plaintiff.

It Is Further Ordered that the order to Show Cause, and all other papers attached to this application, be served on the aforesaid Plaintiff by date _____.

X _____
Judge

Date
United States District Judge.

Defendant List

1. officer Strickland Coastal State Prison
2. Lt. Brittany Beard Coastal State Prison
3. SGT Gillison Coastal State Prison
4. Unit manger Tia Fletcher Coastal State Prison
5. Depty warden C.T. Krugler Coastal State Prison
6. Counselor Ms. Smith Central State Prison
7. Central State Prison business office
8. terrance myricks central state Prison
9. Derrick Davis GDC # central state Prison
10. Kyle walker GDC # waic state Prison
11. Lt Caldwell Central state Prison

Individual $\hat{=}$ Official Capacity

Witness List

1. Alvinesia Davis
2. Derylmaize Jackson
3. Special GBI agent John Doe #1
4. Counselor mactee (Coastal)
5. ms Ivey
6. Creative writing class
7. John Doe # 2
8. SGT Richardson
9. Toliver
10. Trey
11. ms Parker (Coastal)
12. Kalphael Hogan 1002551988
13. Adanson Jacobs 100308125
14. Counselor moore (Coastal)
15. Soc Brown
16. mailroom officer (Coastal)
17. mailroom officer (Central)
18. SGT Gibbs (Coastal)
19. Big C (Coastal)
20. issac grimes
21. SGT Drant (Coastal)
22. Lt. Brown (Coastal)

23. Willie Poole
24. Charlie Baldwin
25. unit manager ms Jordan (Central)
26. Counselor Hodgins
27. unit manager McCall (Central)
28. Lt. Green Central
29. DWCT Passon chambers
30. G. Sampson warden (Central)
31. Counselor Fields (Central)
32. Myron Jones Central
33. Counselor Tilman mental Health
34. Doc Skenson mental Health
35. ms Watkins mailroom Central

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Adrian Lamar Brinson

All other names by which

you have been known:

Adrian L. Graham

ID Number

GDC # 1171205

Current Institution

Central State Prison

Address

4600 Fulton Mill Rd.

Macon

City

Ga.

State

31208

Zip Code

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. Make sure that the defendant(s) listed below are identical to those contained in the above caption. For an individual defendant, include the person's job or title (*if known*) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name

Officer Strickland / Taylor

Job or Title (*if known*)

Officer COI

Shield Number

unknown

Employer

GDC Coastal State Prison

Address

P.O. Box 7150

Garden City

City

Ga.

State

Zip Code



Individual capacity



Official capacity

Defendant No. 2

Name

Lt. Anthony B. Beard

Job or Title (*if known*)

Lt.

Shield Number

unknown

Employer

GDC Coastal State Prison

Address

P.O. Box 7150

Garden City

City

Ga.

State

Zip Code



Individual capacity



Official capacity

Defendant No. 3

Name

SGT Gillison

Job or Title (if known)

SGT

Shield Number

unknown

Employer

GDC Coastal State Prison

Address

P.O. Box 7150

Garden City

Ga.

Zip Code



Individual capacity



Official capacity

Defendant No. 4

Name

Tia Fletcher

Job or Title (if known)

Mental health Unit manager

Shield Number

unknown

Employer

GDC Coastal State Prison

Address

P.O. Box 7150

Garden City

Ga.

Zip Code



Individual capacity



Official capacity

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

Federal officials (a *Bivens* claim)

State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

Right to due process and Exhaustion of Administrative Remedies Administrative Procedures were denied
Right to be free of retaliation for filing 1983
Right to be free of harm (life liberty)
Right to medical treatment.

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

Defendant # 5

Depty warden of care and treatment Krugler
Coastal State Prison
Garden City Ga.

Individual $\frac{3}{4}$ official
Capacity

Defendant # 6

Counselor ms. Smith
Counselor @ central state Prison
4600 fulton mill Rd.
macon Ga. 31208

Individual $\frac{3}{4}$ official
Capacity

Defendant # 7

Business office @ central state Prison
4600 fulton mill Rd.
macon Ga. 31208

Individual $\frac{3}{4}$ official
Capacity

Defendant # 8

terrance myricks (Inmate) Individual
Central state Prison Capacity
4600 fulton mill Rd.
macon ga. 31208

Defendant # 9

Derrick Davis (inmate)
Central state Prison
4600 fulton mill Rd.
macon Ga. 31208

Individual
Capacity

Defendant # 10

Kyle walker (mate)
ware state Prison

Individual
Capacity

Defendant # 11

Lt Caldwell
Central state Prison
4600 fulton mill Rd.
macon Ga. 31208

Individual $\frac{3}{4}$ official
Capacity

- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

Defendants Storeland, Beard, Fletcher, Kragler, Gillison Smith, Caldwell are all employees of Ga Dept of Corrections and acted under color of state while working at the GOC

III. Prisoner Status

Indicate whether you are a prisoner or other confined person as follows (check all that apply):

- ☐ Pretrial detainee
- ☐ Civilly committed detainee
- ☐ Immigration detainee
- ☒ Convicted and sentenced state prisoner
- ☐ Convicted and sentenced federal prisoner
- ☐ Other (explain) _____

IV. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. If the events giving rise to your claim arose outside an institution, describe where and when they arose.

@ coastal state Prison / Central state Prison

- B. If the events giving rise to your claim arose in an institution, describe where and when they arose.

Started @ coastal state Prison still ongoing @ Central state Prison

Claim 1: on Oct 25 2023
2nd block @ Coastal State Prison I spoke
with mental health counselor Macfee at
my appointment and shared with her
concerns that my life was in trouble.
I explained to her that an officer
at the prison had put a hit out
on me because on July 5th 2019
a Bainbridge teen by the name of
Tanzania Rashawn Cooper was shot and
killed in Thomasville Ga. on Fernberg St. My
co defendant Derylmair Jackson was charged
for the murder along with my ex girlfriend
Alvincisa Davis. 2 days after the incident
Derrick Davis shot my stepson in retaliation
to Tanzania murder. Let the record show
that Tanzania Cooper is from Bainbridge
Ga. He is related to Lt Brittany Beard
at Coastal State Prison whom is also
from Bainbridge Ga. I told ms Macfee

that Derrick Davis AKA BB was at Coastal State Prison. Derrick Davis and Lt Beard are classmates from class of 2012. Beard and Davis had made threats to plaintiff Brinson "to make sure he gets touched". Counselor mactee reported the threat to Unit manager tia Fletcher. Unit manager Fletcher and Lt Beard are good friends and instead of relaying message to Security ms Fletcher informed Lt Beard that I was going to write a statement on her. Unit manager ms Fletcher put inmates life in further danger by Giving Lt Beard heads up.

Witness:

Alvinesia Davis

Derylmaize Jackson

GOI special agent John Doe
mactee

Claim 2: on Oct 28 2022

Coastal State Prison 1:38pm medication P.II call window. SGT /Lt Beard stopped and asked could she speak with me a min. I didn't feel comfortable so I asked another inmate John Doe to come with me. Derrick Davis was beside her. Beard stated that "if Beard wants to get something done to you then Beard gets it done." I walked off but was approached by Davis and Davis stated that "if I get Beard in trouble I'll get seen about." I told SGT Richardson about threats by Davis and Beard and Richardson refused to let me go to Protective Custody. On Nov 8th 2022 @ 2:08pm coastal state prison W building yard. I was on the yard and inmate approached me and said that SGT Beard was in the building

looking for me, and that she said she was not leaving until she spoke with me. I stayed outside but she came outside with officer strickland. As soon as SGT Beard seen me she walked up to me and started yelling at me. officer Strickland stood by the door smiling as Beard assaulted me verbal and made more threats that were carried out on Nov 16th 2022. On Nov 15th 2022 and block Coastal State Prison Gym creative writing class with ms ivey. During class I exposed SGT Beard to be corrupt and having evil intents. I told the class in a essay about my issues with Beard and threats to my life. I also told about the illegal activity SGT Beard has been getting into.

Witness

ms ivey
creative writing class
John Doe #2
SGT Richardson

Toliver

Claim 3: on nov 16th 2022 @
 Coastal state prison 7:12am inmate
 Trey witnessed officer Strickland speaking
 with inmate See Brown and Strickland
 stated that there was a hit on a muslim.
 Inmate Trey had knowledge of the
 threat made by Beard and thought that
 Strickland was speaking of me so he told
 me to be careful. nov 16th 2022 @ coastal
 state prison 2:38pm in building. officer strickland
 called me outside the building and told
 me to pack up my things. Once I returned
 with my property officer strickland was
 outside talking to Derrick Davis and Kyle
 Walker. Inmate Hogan and Jacob approached
 me and told me "they heard what's going
 on and to don't say nothing when I
 get to the building." I turned around and
 Davis and Walker had came up behind
 me. They attacked me. During the
 attack officer strickland was less than

feet away while the incident took place.
 officer stickland didn't aid assist,
 didn't call in 1010 code didn't respond
 didn't stop the inmates. Didn't report the
 incident and made threats that "SGT Beard
 was at medical don't go that way."
 As I passed stickland to get away
 from attackers another group of inmates
 attacked my by N building gate. I
 ran up the flat top and went to
 security. I was never treated
 at medical I was refused medical
 treatment by Deputy warden of CIT
 she asked me where I couldn't go
 and I told her the dudes that jumped
 on me from F building and that's where
 she put me. SGT Gillison and Deputy warden
 of care & treatment denied me medical
 attention after the incident and denied
 me protective custody after I wrote a
 statement of the inmates and officers
 involved.

Witnesses

They
Hagen

Parler

more
Hagen

Counselor

Jacobs
Joe Brown

Claim 4: On Nov 16th 2023 ^{2:44pm} Coastal

State Prison. Deputy warden of care and treatments office. Once I got into the office, office of ms Krugar! SGT Gillison and SGT Gibbs were in the room. As I stated to the warden what was going on SGT Gillison stopped me and defended SGT Beard saying she has nothing to do with this. I told the Dwr that I wanted to go to protective custody and they said I would have to make a statement with names so I did. Once I wrote the statement in which included Strickland and Beards illegal activities SGT Gillison quickly pulled up the footage and made a copy. My nose was still bleeding and they made me sit in the lobby while they talked. No medical attention given. Inmate Brinson didn't receive no more medical treatment while being at Coastal due to retaliation from staff that were friends with SGT Beard. Dwr Krugar asked what building I could go to because there was no room in the hole denying me protective custody. I told her any where but F building because SGT Beard ran that building and the boys connected to the assault were in that building." SGT Gillison stated Put him in F." Putting me in further danger.

Dwarden called Officer Strickland to the office and showed her the Statement. Officer Strickland walked out the room, looked at me and returned to her post and told the inmates I switched on her due to Officer Strickland no longer being employed at Coastal State Prison cause inmates to make threats towards Brinson.

Witness

Mail room officer

SGT Gibbs

Counselor Moore

MS Packer

Claim 5: On NOV 22 2023
 @ Coastal State Prison 3pm SGT
 Drant was told by DW of care & treatment
 to bring me to his office. Once I got to
 the office SGT Gillson and Gibbs was
 in there. SGT Gillson stated "I told you
 to leave SGT Beard out of it. Today going
 to be your last day breathing at Coastal
 State Prison" SGT Gillson retaliated against
 me and placed me in the hole for
 no reason and without DR. I was placed
 in the hole without my property, no mat
 blanket or anything. On NOV 23, 2023
 Lt Brown brought my property and mat.
 Officer Big C was instructed by SGT
 Gillson to move me to a room upstairs
 but I told him that all the dudes that
 attacked me are upstairs. Big C stated
 that SGT Gillson said "if I didn't move
 rooms she would come and spray me." SGT
 Gillson put me in the room with Isaac
 games. A inmate that is known for stabbing

inmates. Isaac Gines stated before he attacked Plaintiff on Nov 23 2023 that SGT G. Obs got him to jump on me. Gines stated that he was paid on apple pay. During the attack officers didn't respond to Plaintiff's screams and didn't provide medical attention.

witness

Big C (Officer) Coastal State Prison
 Isaac Gines inmate Central State Prison
 SGT Durant (Officer) Coastal State Prison
 Lt Brown (Officer) Coastal State Prison
 SGT G. Obs (Officer) Coastal State Prison
 Willie Pook
 Charlie Baldwin

Claim 6: On Nov 16th 2023

at Coastal State Prison I raised all the inmates that were involved in state ment and grievance. Shortly after getting to Central State Prison inmate Grimes was transferred to Central from Johnson State Prison between leaving Coastal and going to central was only 90 days and three prisons. Shortly after issue arrived Derrick Daus (BB) arrived and has kept up mess trying to get ppl to jump on plaintiff. Defendant terrance myricks and Derrick Daus attacked

Plaintiff on May 3rd 2023 at central State Prison. Plaintiff reported to officer Jones the threat and she passed word to Lt Caldwell but both officers refused protection.

Custody and networked with inmates to push plaintiff back inside. The clown inmates terrance myricks and Derrick Daus sent text messages around the prison stating that Plaintiff was a snitch and a poice was on his head. Plaintiff moved around to 5 different cells for his safety along with inmate myron Jones.

Officer Jones and Lt Caldwell refused
medical attention refused protective
custody and put plaintiff life in
danger.

witness.

Officer Jones

Lt Green

Undaunted Ms. McCall

Myron Jones

Claim 7: On Feb 24 2023 Plaintiff received papers from Courts ordering that he get Consent form sent back along with a copy of Lincoln. I turned in forms to business office to be returned signed but business office at Central never returned forms. mailroom officer stated she never received anything from business office. unit manager ms Jordan stated that business office stated they will return papers on march 8th 2023 via phone. They still never returned papers. Spoke to Counselor Higgins Counselor Dhr Care & treatment, warden Sampson, about papers and still to this day have yet to get them from business office and holding me back from moving forward with lawsuit.

Witnesses.

Counselor Higgins

Counselor Tolman

Doc Stevenson

Dhr Care & treatment

G. Sampson

ms Jordan
mailroom officer

Claim 8: On May 4th 2023 Plaintiff approached Counselor Smith in a bad state and explained to her what was going on. I told her inmates had placed hit on my head I told her what happened at last camp and tried to give her a emergency grievance to turn in but she refused to take my grievance because she said she aint my Counselor and it aint her problem. Counselor Smith refused to sign my grievance and refused me protective Custody. I filed emergency grievance on lock and grievance has yet to be answered 1 month late.

Witness

Counselor Fields
Counselor Hudgins
Officer Jones
Myron Jones

Counselor Tolman
Doctor Stevenson
Mrs Watkins

Claim ~~90~~ 9: In retaliation to filing the grievance on Nov 23 2022 and Statment on SGT Beard and officer Strickland I was transferred on Dec 4th 2022 to Central State. my family ordered a food package and I never received my package. Grievance was filed and still never received package. As soon as I got to central state I was put on lockdown for 2 weeks and this kept me from doing any law work and filing any paperwork on my behalf. This delay held me back on doing law work and I was not allowed to see Counselor medical or send any mail during this 2 week period. Upon coming to central officers at central spoke about the incident at Coastal with the other inmates

Witness

Charlie Baldwin (inmate) central
 Willie Poole (inmate)
 MS Jordan central

Counselor Hudgins. central

C. What date and approximate time did the events giving rise to your claim(s) occur?

Started on nov 8th 2022 then 1st attack happened on nov 16th then 2nd attack was during the holc nov 22 2022

D. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

SBT Beard is related to a teenager from Bainbridge Ga. That was killed in July 2019. I was suspect and arrested for the murder. SBT Beard found out who I was and placed money on my head working along with officer Strickland and her classmate Derrick Davis.

V. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

During the attack my nose was broke received cut on hands and neck and back Pains from assault in isolation

VI. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

Relief that I request is for all parties that had something to do with incident and are named defendants should resign at the department of correction and for Damages irreplacable I request that each defendant pay the amount of 1 million dollars for the reckless acts with evil intent that caused injuries on nov 16 22

VII. Exhaustion of Administrative Remedies Administrative Procedures

The Prison Litigation Reform Act ("PLRA"), 42 U.S.C. § 1997e(a), requires that "[n]o action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted."

Administrative remedies are also known as grievance procedures. Your case may be dismissed if you have not exhausted your administrative remedies.

- A. Did your claim(s) arise while you were confined in a jail, prison, or other correctional facility?

☒ Yes

☐ No

If yes, name the jail, prison, or other correctional facility where you were confined at the time of the events giving rise to your claim(s).

Nov 16 2022
Coastal State Prison to Central State Prison

- B. Does the jail, prison, or other correctional facility where your claim(s) arose have a grievance procedure?

☒ Yes

☐ No

☐ Do not know

- C. Does the grievance procedure at the jail, prison, or other correctional facility where your claim(s) arose cover some or all of your claims?

☒ Yes

☐ No

☐ Do not know

If yes, which claim(s)?

assault on Nov 16th 2022 Retal. taken and placed in hole on Nov 23. 22

- D. Did you file a grievance in the jail, prison, or other correctional facility where your claim(s) arose concerning the facts relating to this complaint?

☒ Yes

☐ No

If no, did you file a grievance about the events described in this complaint at any other jail, prison, or other correctional facility?

☒ Yes

☐ No

- E. If you did file a grievance:

1. Where did you file the grievance?

I filed a grievance at Coastal and Councilman Smith @ Central State Refused to sign my grievance here

2. What did you claim in your grievance?

Officers @ Coastal State prison worked with inmates to attack me and threats from these officers.

3. What was the result, if any?

Grievance Rejected Appeal Rejected.

4. What steps, if any, did you take to appeal that decision? Is the grievance process completed? If not, explain why not. (Describe all efforts to appeal to the highest level of the grievance process.)

Appealed the decision all the way to Dept of Corrections.

F. If you did not file a grievance:

1. If there are any reasons why you did not file a grievance, state them here:

2. If you did not file a grievance but you did inform officials of your claim, state who you informed, when and how, and their response, if any:

Spoke with counselor Mackee and with manager
Tia Fletcher about threats nothing was done.

G. Please set forth any additional information that is relevant to the exhaustion of your administrative remedies.

Central State Prison Counselor - refuse to sign
or accept any of my grievances.

(Note: You may attach as exhibits to this complaint any documents related to the exhaustion of your administrative remedies.)

VIII. Previous Lawsuits

The "three strikes rule" bars a prisoner from bringing a civil action or an appeal in federal court without paying the filing fee if that prisoner has "on three or more prior occasions, while incarcerated or detained in any facility, brought an action or appeal in a court of the United States that was dismissed on the grounds that it is frivolous, malicious, or fails to state a claim upon which relief may be granted, unless the prisoner is under imminent danger of serious physical injury." 28 U.S.C. § 1915(g).

To the best of your knowledge, have you had a case dismissed based on this "three strikes rule"?

☐

Yes

☒

No

If yes, state which court dismissed your case, when this occurred, and attach a copy of the order if possible.

- A. Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action?

☐ Yes

☒ No

- B. If your answer to A is yes, describe each lawsuit by answering questions 1 through 7 below. *(If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)*

1. Parties to the previous lawsuit

Plaintiff(s) _____

Defendant(s) _____

2. Court *(if federal court, name the district; if state court, name the county and State)*

3. Docket or index number

4. Name of Judge assigned to your case

5. Approximate date of filing lawsuit

6. Is the case still pending?

☐ Yes

☐ No

If no, give the approximate date of disposition. _____

7. What was the result of the case? *(For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)*

- C. Have you filed other lawsuits in state or federal court otherwise relating to the conditions of your imprisonment?

Pro Se 14 (Rev. 12/16) Complaint for Violation of Civil Rights (Prisoner)

- ☐ Yes
- ☒ No

D. If your answer to C is yes, describe each lawsuit by answering questions 1 through 7 below. *(If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)*

1. Parties to the previous lawsuit

Plaintiff(s) _____

Defendant(s) _____

2. Court *(if federal court, name the district; if state court, name the county and State)*

3. Docket or index number

4. Name of Judge assigned to your case

5. Approximate date of filing lawsuit

6. Is the case still pending?

☐ Yes

☐ No

If no, give the approximate date of disposition _____

7. What was the result of the case? *(For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)*

IX. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.


Date of signing: 6/1/23

Signature of Plaintiff

Printed Name of Plaintiff

Prison Identification #

Prison Address


Adrian Lamar Brinson
1121205 GDC #
4600 Felton mill Rd.
macon Ga 31208
City State Zip Code

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

City

State

Zip Code

Telephone Number

E-mail Address